

REMARKS/ARGUMENTS

Favorable reconsideration of this application is respectfully requested.

Claims 15-24 are pending in this application. Claims 15-16, 18-22, and 24 were rejected under 35 U.S.C. §103(a) as unpatentable over U.S. patent 5,566,278 to Patel et al. (herein "Patel") in view of U.S. patent 6,208,427 to Lee. Claims 17 and 23 were rejected under 35 U.S.C. §103(a) as unpatentable over Patel in view of Lee and further in view of U.S. patent 6,462,756 to Hansen et al. (herein "Hansen").

Addressing the above-noted rejections, those rejections are traversed by the present response.

Applicants respectfully submit the outstanding rejection does not properly consider the claimed features relative to the combination of teachings of Patel in view of Lee. Specifically, no combination of teachings of Patel in view of Lee teaches the features of a ***printer driver*** performing editing processes on image data.

As discussed in the present specification with respect to the background, when an image to be printed is edited, a document can be processed in an application.¹ However, the applicants of the present recognized that such an editing in an application cannot be simply performed and processed by a printer driver, and therefore the claimed invention provides a novel printing image forming apparatus and method enabling an operator to simply edit, on a printer driver, a document on a computer and to print the document.² Thereby, in the present apparatus and method an application is first activated to issue an order to print an original document, and then a printer driver is activated to start to operate.³ Then, various steps are taken by the printer driver to allow the printing of the document. Such features of the

¹ Specification at page 1, lines 19-21.

² Specification at page 2, lines 4-9.

³ Specification at page 4, lines 1-4.

performing the noted operations in a printer driver of a printing image forming apparatus are believed to clearly distinguish over the applied art to Patel and Lee.

In the present invention an editing process on image data is performed on the printer driver instead of on applications, unlike the prior art. More specifically, display of the image data on a screen is performed on the printer driver in the prior art; however, the editing process is not performed on the printer driver in the prior art.

The newly cited primary reference to Patel merely discloses a system in which an application program 102 can operate in conjunction with a printer driver 110. However, such features are unrelated to the claimed invention.

As discussed above, a conventional operation allows the display of image data on a screen performed on a printer driver. However, editing processes are not performed on a printer driver in conventional systems. Patel appears no more relevant than such conventional systems in that Patel does not disclose or suggest performing any editing processes on printer driver 110. Patel appears to utilize the application program 102 for any such editing processes, as in the conventional art.

In fact the Office Action appears to recognize that the printer driver 110 in Patel does not disclose any of the operations directed to the printer driver as recited for example in independent Claim 15, particularly the operations of the displaying, inserting, forming, and further displaying. Such deficiencies on Patel appear recognized in the Office Action.⁴ To overcome the deficiencies in Patel the outstanding Office Action cites Lee in particular at column 3, lines 25-55. However, Lee cannot overcome the deficiencies in Patel with respect to the claimed features.

⁴ Office Action of February 24, 2005, page 3, first full paragraph.

Lee is directed to a personal digital system (PDA) that includes a fax modem 160 that transmits and receives fax data to allow the fax data to be transmitted, to thereby be printed.⁵

First, applicants note the teachings in Lee are completely unrelated to the teachings in Patel and one of ordinary skill in the art would not even combine such teachings.

Patel is directed to an object-oriented printing system. Lee is directed to a PDA. Such systems are completely unrelated and incompatible. Lee discloses sending information to a printer for printing. Thus, the only possible combination of the teachings of Lee in view of Patel would be for Lee to transmit data from the PDA therein to an object oriented printing system such as in Patel. However, such a combination of teachings is not even related to the claimed features. That is, such a combination of teachings would not involve and could not involve taking the features in Lee and utilizing such features in the object oriented printing system of Patel. That is the case because Lee is directed to a PDA that transmits data to a printing system and Patel is directed to a printing system itself.

In such ways, no combination of teachings of Patel in view of Lee meet or suggest the claimed features.

Further, even combining the teachings in Lee to the teachings in Patel would not fully meet the claim limitations.

Lee also differs significantly from the claimed features. More specifically, Lee is also not directed to operations performed in a *printer driver*. In Lee the actual printing operation is performed by a fax machine and a control in Lee is part of a personal digital assistant (PDA), which is not a printing image forming apparatus, that merely allows fax transmission. Lee is also clearly not directed to the claimed operations performed by a printer driver.

⁵ See for example Lee at column 3, lines 1-3 and 61 *et seq.*

In such ways, even if the teachings in Lee were combined with the teachings in Patel, it would still not result in a **printer driver** performing the editing operations as recited in the claims.

Stated another way, as Lee does not even disclose allowing a printer driver to perform any specific editing operations, if the teachings in Lee were combined with the teachings in Patel it would merely result in the application program 102 in Patel at most being able to perform functions as in Lee. In Lee it is the PDA and not the printer driver that performs the noted operations. Similarly in Patel it is the application program 102 and not the printer driver 110 that performs the editing operations. Thus, if the teachings in Lee were combined with the teachings in Patel at most that would result in the application program 102 in Patel performing editing operations.

Such a combination of teachings in Lee in view of Patel would not result in a **printer driver** performing editing operations as recited in the claims.

Moreover, no teachings in Hansen are cited to overcome the above-noted deficiencies of Patel in view of Lee.

Further, the teachings in Hansen are directed to a system and method for managing production printing workflow and are unrelated to the teachings in Lee. Lee again is not directed to a printer or any type of printer system, and thus Lee would have no use for the system of managing production printing workflow as in Hansen.

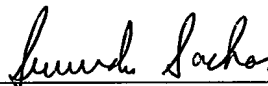
Thereby, no further teachings in Hansen are seen to overcome the above-noted deficiencies of Patel in view of Lee.

In view of these foregoing comments, applicants respectfully submit the claims as currently written distinguish over the outstanding rejections.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

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